



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

NDB/RMP  
F. #2022R00883/NY-NYE-865

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By USAfx and ECF

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Re: United States v. Goran Gogic  
Criminal Docket No. 22-493 (ARR)

Dear Counsel:

This letter will be accompanied by a link, sent by separate e-mail, to the secure download of a production of discovery in accordance with Rule 16 of the Federal Rules of Criminal Procedure, which supplements the government's productions on March 23, 2023, June 7, 2023, September 20, 2023, and October 26, 2023. This production is made pursuant to the protective order entered by the Court on September 20, 2023 (ECF Dkt. No. 28), and the stipulation and order entered by the Court on October 3, 2023 (ECF Dkt. No. 31). The government also requests reciprocal discovery from the defendant.

The enclosed production contains copies of the following records, all of which are related to the MSC Gayane, from which approximately 20 tons of cocaine was seized in June 2019:

- (1) the crew list, Bates-numbered SENSITIVE GOGIC000905;
- (2) laboratory reports for cocaine, Bates-numbered GOGIC000906 – GOGIC000912;
- (3) property receipts for DNA collected from the crew, Bates-numbered SENSITIVE GOGIC000938 – SENSITIVE GOGIC000961;
- (4) photographs and/or videos of or from (i) bales of cocaine, Bates-numbered GOGIC000962 – GOGIC001068; (ii) the bridge voyage data recorder ("VDR"), Bates-numbered

GOGIC001069 – GOGIC001082; (iii) containers that contain cocaine, Bates-numbered GOGIC001083 – GOGIC001132; (iv) crew cabins, Bates-numbered GOGIC 001133 – GOGIC001192; (v) deck store, Bates-numbered GOGIC001193 – GOGIC001202; (vi) other general parts of the vessel and its contents, Bates-numbered GOGIC001203 – GOGIC001314; (vii) execution of a July 4, 2019 warrant that sought additional evidence from the Gayane, Bates-numbered GOGIC001315 – GOGIC001352; (viii) execution of a June 28, 2019 warrant that sought additional evidence from the Gayane, Bates-numbered GOGIC001353 – GOGIC001401; (ix) law enforcement authorities, Bates-numbered GOGIC001402 – GOGIC001699; (x) identification for select crew, Bates-numbered SENSITIVE GOGIC001704– SENSITIVE GOGIC001708; (xi) seals, Bates-numbered GOGIC001709 – GOGIC 001771; and (xii) vessel layout, Bates-numbered GOGIC001772 – GOGIC001780;

(5) Ship logs and related documents including ballast logs, ballast water records, records from the bell book bridge, the bridge logbook, crew ashore log, gangway visitor log, and others, Bates-numbered GOGIC001781 – GOGIC002888;

(6) U.S. Coast Guard ion scans, Bates-numbered GOGIC002889 – GOGIC002899; and

(7) data from the ship's vessel data recorder, Bates-numbered GOGIC002900 – GOGIC002942.

Very truly yours,

BREON PEACE  
United States Attorney

By: /s/ Nomi D. Berenson  
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cc: Clerk of the Court (ARR) (by ECF) (without download link)